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**PACIFIC**  **TELESIS**  
Group-Washington

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

September 7, 1995

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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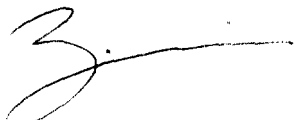
Dear Mr. Caton:

Re: *CC Docket No. 92-297 - Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5 - 29.5 GHz Frequency Band, to Reallocate the 29.5 - 30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*

On behalf of Pacific Telesis Wireless Broadband Services, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

  
Enclosure

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Rulemaking to Amend Parts 1, 2, 21, and 25 )  
of the Commission's Rules to Redesignate )  
the 27.5 - 29.5 GHz Frequency Band, to )  
Reallocate the 29.5 - 30.0 GHz Frequency )  
Band, to Establish Rules and Policies for )  
Local Multipoint Distribution Service and )  
for Fixed Satellite Services )  
\_\_\_\_\_ )

CC Docket No. 92-297

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**COMMENTS OF PACIFIC TELESIS WIRELESS BROADBAND SERVICES**

Pacific Telesis Wireless Broadband Services ("PTWBS") hereby files comments on the Third Notice of Proposed Rulemaking and Supplemental Tentative Decision in the above named matter.

We agree with the Commission's approach regarding the proposed rulemaking. PTWBS fully endorses the Commission's desire to create competition in the market for video and interactive services and believes that LMDS will help accomplish this important objective to the benefit of consumers. In particular:

We favor licensing of a full 850 MHz plus 150 MHz of non-contiguous spectrum to a single licensee per Rand-McNally Basic Trading Area ("BTA"). This 1 GHz of spectrum will be necessary for LMDS service providers to compete with existing and developing video and interactive services. We agree with the previously-stated positions of LMDS equipment manufacturers such as Texas Instruments and Hewlett-Packard Company that the non-

contiguous assignment of spectrum will fulfill service providers' requirements for both inbound and outbound service. In addition, we agree with the Commission's position that there should be no restrictions on the number of BTAs in which a particular licensee is licensed nor restrictions on the amount of spectrum. We do not believe that licensing of LMDS spectrum should be restricted to any particular entities.

In general, we encourage the Commission to be flexible in setting rules around system architecture and design such as cell patterns and placement. We agree wholeheartedly with the Commission's statement that allocation of the 28 GHz band to LMDS does not preclude the potential future need for additional spectrum at 40+ GHz for LMDS-like services.

We are encouraged by the cooperation of Motorola during the Negotiated Rulemaking to mitigate interference between LMDS and Motorola Iridium feeder links. Because 150 MHz of spectrum may be used for the return path, we believe that additional work should be done in this area to finalize interference mitigation techniques. We are confident that such mitigation can be accomplished through cooperation of the interested parties.

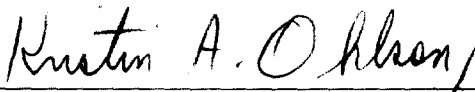
We strongly encourage the Commission to pursue its proposal to allow LMDS licensees to disaggregate and geographically partition the licensed spectrum within their granted service areas and to enter into lease arrangements with others so that this very valuable spectrum may be used for a number of applications to benefit the public.

While in general we advocate consistent licensing procedures for all licensees, we support the Commission's suggested resolution of the Hye Crest/Suite 12 licensing dilemma. We encourage the Commission to be flexible both in the types of services provided in the LMDS band and the manner in which they are provided. We encourage the Commission to place very few limitations on the technical approaches used by licensees in offering services.

We agree that only orthogonal polarization should be used, and that interference concerns at BTA boundaries be resolved through prior frequency coordination similar to procedures outlined in CFR 21.100(d)

Respectfully submitted,

PACIFIC TELESIS WIRELESS  
BROADBAND SERVICES

  
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Its Attorneys

Dated: September 7, 1995